

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re Terrorist Attacks on September 11, 2001**

**03 MDL 1570 (RCC)  
ECF Case**

**CANTOR FITZGERALD & CO., et al.,**

**Plaintiffs,**

**04 CV 7065 (RCC)  
ECF Case**

**v.**

**AKIDA BANK PRIVATE LIMITED, et al.,**

**Defendants.**

**DECLARATION OF JONATHAN M. GOODMAN IN SUPPORT OF THE  
CANTOR FITZGERALD AND PORT AUTHORITY PLAINTIFFS OPPOSITION TO  
THE MOTION TO DISMISS OF DEFENDANT FAISAL ISLAMIC BANK (SUDAN)**

Jonathan M. Goodman, Esq. declares under penalty of perjury:

1. I am associated with the law firm of Dickstein Shapiro Morin & Oshinsky LLP, counsel for Plaintiffs Cantor Fitzgerald & Co., Cantor Fitzgerald Associates, L.P., Cantor Fitzgerald Brokerage, L.P., Cantor Fitzgerald Europe, Cantor Fitzgerald International, Cantor Fitzgerald Partners, Cantor Fitzgerald Securities, Cantor Fitzgerald, L.P., Cantor Index Limited, CO2e.com, LLC, eSpeed Government Securities, Inc., eSpeed, Inc., eSpeed Securities, Inc., TradeSpark, L.P.; and the Port Authority of New York and New Jersey, Port Authority Trans-Hudson Corporation, and WTC Retail LLC (collectively, the "Cantor Fitzgerald Plaintiffs") in the above-

captioned matter. This declaration is submitted in support of the Cantor Fitzgerald Plaintiffs opposition to the motion to dismiss of Defendant Faisal Islamic Bank (Sudan).

2. Attached hereto as Exhibit 1 is a true and correct copy of the Court's June 13, 2005 decision in *Presbyterian Church of Sudan v. Talisman Energy, Inc.*, 01 Civ. 9882 (DLC) (S.D.N.Y. June 13, 2005).

3. Attached hereto as Exhibit 2 is a true and correct copy of relevant pages from trial testimony in *United States v. Usama bin Laden*, S(7) 98 Cr. 1023 (S.D.N.Y. Feb. 6, 2001).

4. Attached hereto as Exhibit 3 is a true and correct copy of relevant pages from United States Library of Congress Country Studies (Sudan), Finance, found at [www.country-studies.com/sudan/finance.html](http://www.country-studies.com/sudan/finance.html).

5. Attached hereto as Exhibit 4 is a true and correct copy of relevant pages from United States State Department, Patterns of Global Terrorism: 1991, Africa Overview (Apr. 1991), found at [www.fas.org/irp/threat/terror\\_91/africa.html](http://www.fas.org/irp/threat/terror_91/africa.html).

6. Attached hereto as Exhibit 5 is a true and correct copy of relevant pages from United States State Department Issues Factsheet on Bin Ladin (Aug. 14, 1996).

7. Attached hereto as Exhibit 6 is a true and correct copy of the Congressional Testimony of J. T. Caruso, Acting Assistant Director, CounterTerrorism Division, FBI, Before the Subcommittee on International Operations and Terrorism,

Committee on Foreign Relations, United States Senate (Dec. 18, 2001), found at [fbi.gov/congress/congress01/caruso121801.htm](http://fbi.gov/congress/congress01/caruso121801.htm).

8. Attached hereto as Exhibit 7 is a true and correct copy of the Court's November, 10, 2004 decision in *Boim v. Quranic Literary Instit.*, No. 00 C 2905 (Keyes, A., Mag. J.) (N.D. Ill. Nov. 10, 2004).

9. Attached hereto as Exhibit 8 is a true and correct copy of United States Treasury, Office of Public Affairs, Press Release, U.S. Treasury Designates Two Individuals with Ties to al Qaida, UBL (Dec. 21, 2004), found at [www.treas.gov/press/releases/js2164.htm](http://www.treas.gov/press/releases/js2164.htm).

10. Attached hereto as Exhibit 9 is a true and correct copy of the transcript of the Congressional Testimony of U.S. Deputy Assistant Secretary of State, Jonathan M. Winer, Before the Committee on Governmental Affairs, United States Senate (July 31, 2003), found at [www.globalsecurity.org/security/library/congress/2003\\_h/030731-winer.htm](http://www.globalsecurity.org/security/library/congress/2003_h/030731-winer.htm).

11. Attached hereto as Exhibit 10 is a true and correct copy of relevant pages of Thompson Bank Directory, World: J-Z (Dec. 2004 – May 2005).

12. Attached hereto as Exhibit 11 is a true and correct copy of relevant pages of Thompson Bank Directory Worldwide Correspondents & Resource Guide (Dec. 2004 – May 2005).

13. Attached hereto as Exhibit 12 is a true and correct copy of a ABQ Zawya Ltd., Company Information Listing for Al Shamal Islamic Bank, found at [www.zawya.com/cm/officersprint.cfm?companyid=1000787](http://www.zawya.com/cm/officersprint.cfm?companyid=1000787).

14. Attached hereto as Exhibit 13 is a true and correct copy of relevant pages of a report of Katzman, K., Congressional Research Service, "Terrorism: Near Eastern Groups and State Sponsors, 2002," (Feb. 13, 2002).

15. Attached hereto as Exhibit 14 is a true and correct copy of a newspaper article entitled, Judith Miller, "The Islamic Wave," the New York Times Magazine (May 31, 1992))

16. Attached hereto as Exhibit 15 is a true and correct copy of a newspaper article entitled, Jonathan Randal, "Sudan Party Puts New Face on Fundamentalism," Washington Post, A30, Col. 4 (April 7, 1988)).

17. Attached hereto as Exhibit 16 is a true and correct copy of the Arabic version and English translation of an article in Egyptian newspaper Ruz Al Youssif entitled, Ossama Bin Laden: I Bought The Jihad Groups With My Own Money (June 17, 1996).

Dated: New York, New York  
June 27, 2005

/s/  
Jonathan M. Goodman